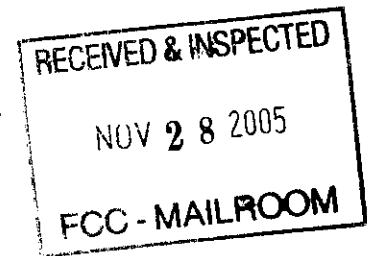




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November 23, 2005

*Via Overnight Delivery*



Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: **Compliance Letter - IP-Enabled Services**, WC Docket No. 04-36;  
*E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196

Dear Ms. Dortch:

Harbor Communications, LLC ("Harbor") hereby submits this letter in compliance with the Commission's *VoIP 911 Order*<sup>1</sup> in the above referenced dockets.

Harbor does not market, offer or provide VoIP Service on a nationwide basis. It currently provides service in Mobile, Alabama, portions of Baldwin County, Alabama and Pensacola, Florida. In these areas, Harbor is providing 911/E911 service to 100% of its VoIP customers in compliance with the Commission's rules. Further, Harbor will not market to or accept new customers whose primary Registered Locations are in areas where it does not have 911 capability.

As a Competitive Local Exchange Carrier authorized to provide local exchange service in Alabama and Florida, Harbor is currently interconnected with the public switched telephone network (PSTN) and the Wireline E911 Network through its Interconnection Agreements with the incumbent local exchange carriers in the above areas.

Emergency 911 calls placed by Harbor's VoIP customers are routed through Harbor's local switch and over its 911 interconnection trunks with the incumbent carrier. As such, 911 calls from Harbor VoIP customers are either routed directly to the appropriate 911 Tandem or selective router, or routed to the incumbent local exchange carrier for delivery to the appropriate PSAP, the designated statewide default answering point or appropriate local emergency authority based on Registered Location information in the incumbent local exchange carrier's 911/E911 (Automatic Location Identification, or "ALI") database.

Harbor transmits the caller's ANI with each call. Harbor updates each customer's Registered Location, through its relationship with Intrado, in each of the incumbent local exchange carrier's 911/E911 databases.

<sup>1</sup> *IP-Enabled Services and 911 Requirements for IP-Enabled Service Providers*, WC Docket Nos. 04-36 & 05-196, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116, 20 FCC Rcd 10245 (2005) ("*VoIP 911 Order*").

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Harbor has obtained, through direct contact, 100% of its existing subscriber's current Registered Locations. This information was gathered from customers during the account establishment process. New subscribers' initial Registered Locations will also be required prior to service activation and will be obtained through direct contact with the customer.

Customers may update their Registered Location information by contacting Harbor by telephone via its local or toll free customer service number. Harbor plans to add a second method of updating this information with the introduction of an online account management tool by April 2006.

Current Harbor customers have been, and future customers will be, advised (1) through the sales process, (2) at the time of service implementation and (3) through acknowledged terms and conditions, that the VoIP Service provided by Harbor is not a nomadic service, but rather a fixed service to be used only at the customer's primary Registered Location. Should a change in primary Registered Location occur, customers have acknowledged that they must contact Harbor to update their Registered Location and that 911 service will not route properly until this update is received and processed internally by Harbor.

Harbor is committed to ensuring its customers understand that its VoIP service is only offered and provided as a fixed service. Nevertheless, Harbor continues to research technical solutions that would allow it to offer VoIP service on a nomadic basis in compliance with the Commission's rules.

Should you have any questions regarding this compliance letter, please contact me by telephone at (251) 662-1522 or by email at [eforbess@harborcom.com](mailto:eforbess@harborcom.com).

Sincerely,



Ed Forbess  
Director, Network Operations

cc: Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau  
Janice Myles, Competition Policy Division, Wireline Competition Bureau  
Best Copy and Printing, Inc. (BCPI)